

8.8 Planning Proposal Request - 2 Farrow Road, Campbelltown

Reporting Officer

Executive Manager Urban Centres
City Development

Community Strategic Plan

Objective	Strategy
3 Outcome Three: A Thriving, Attractive City	3.4 - Retain and expand existing businesses and attract new enterprises to Campbelltown, offering opportunities for a diverse workforce including professional, technology and knowledge based skills and creative capacity

Officer's Recommendation

1. That Council not support the Planning Proposal Request (attachment 1) which seeks rezoning of industrial land at 2 Farrow Road to permit high rise residential development and mixed use development outcomes and changes to the maximum permissible height of buildings for the site (with a variety of heights up to 101 metres/28 storeys).
2. That the applicant be advised of Council's decision.

Executive Summary

- Council has received an owner-initiated Planning Proposal Request (PPR), seeking an amendment of Campbelltown Local Environment Plan 2015 (CLEP 2015) to rezone industrial land at 2 Farrow Road, Campbelltown to permit high rise residential development) and mixed use development outcomes on the subject land with accompanying alterations to the maximum height of buildings map (with a variety of heights up to 101 metres/28 storeys). The proposed rezoning and change to the maximum height of buildings map has the potential to provide future development of 1200 dwellings on the subject land.
- The subject land is 2.84 hectares in area and is strategically located adjacent to Campbelltown Railway Station, being part of a broader industrial precinct on the western side of the main rail line. The site is occupied by a single level warehouse building with a floor area of approximately 10,543sqm and used for industrial activities.

- As part of the broader review of CLEP 2015, Council has separately endorsed a planning proposal to rezone the subject land from 4B Industry under LEP 2002 to IN2 Industrial under CLEP 2015. This zoning amendment is being undertaken to address the 'deferred matter' status of the land under the CLEP 2015. The endorsed planning proposal also introduces a height limit of 19m to the site to be consistent with height controls for industrial development for the IN2 Industrial zone under CLEP 2015. The planning proposal has been publicly exhibited and forwarded to the Department of Planning, Industry and Environment for finalisation. It is anticipated that it will be finalised within a few months.
- The PPR is accompanied by an urban design study and conceptual precinct plan providing an urban renewal vision for the site and surrounding industrial precinct, including conceptual building envelopes, publicly accessible areas, sporting facilities and public open space along Bow Bowling Creek. The urban design study and associated precinct plan is aspirational in nature and has not been endorsed by Council or any other affected land owners. In this respect the PPR proposes amendments to CLEP 2015 for the subject site only, not the broader precinct shown in the accompanying study.
- Advice has been obtained from the Campbelltown Local Planning Panel (the Panel) to assist Council's determination of the matter in accordance Section 2.19 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Panel does not support the PPR.
- The PPR has been assessed in accordance with the relevant state and local planning framework, including the Reimagining Campbelltown City Centre Master Plan, and a number of inconsistencies have been identified that are considered significant enough for the PPR to not be supported. Details of these inconsistencies are discussed in the body of the report, and generally relate to the following broad issues:
 - loss of strategically important employment land
 - unwarranted expansion of housing capacity in the city centre
 - potential negative impacts on the revitalisation of Queen Street
 - excessive building heights
- It is recommended that Council do not support the PPR.

Purpose

The purpose of this report is to inform Council of a PPR that Council has received for 2 Farrow Road, Campbelltown, provide an assessment of that proposal and inform Councillors of the advice of the Panel in this regard.

Property Description	Lot 1 DP 406940, 2 Farrow Road, Campbelltown
Application No	1250/2020/E-PP
Applicant	Hyside Projects Subone Pty Ltd
Owner	Campbelltown Central 2 Pty Limited
Date Received	4 May 2020

History

The subject PPR was submitted to Council on 4 May 2020. A key part of the PPR was the requested amendment of CLEP 2015 to permit staggered building heights across the subject land up to a maximum height of 121 metres (36 storeys).

In response to the Councillor Briefing on 21 July 2020 and having regard to prior discussions with Council planning staff, the proponent submitted an addendum to their proposal on 19 August 2020 reducing the proposed spread of building heights across the site. The addendum modified the PPR by reducing the proposed height limits across the site (attachment 4), including the reduction of the maximum height limit from 121 metres (36 storeys) to 101 metres (28 storeys).

Report

1. Introduction

The subject PPR is an owner initiated proposal and seeks an amendment of Campbelltown Local Environment Plan 2015 (CLEP 2015) to rezone industrial land at Lot 1 DP 406940, 2 Farrow Road Campbelltown and increase the maximum permissible height of buildings applicable to the site. The site is a corner allotment with frontages to Badgally Road and Farrow Road and total area of 2.8 hectares. The land is strategically located adjacent to Campbelltown Railway Station, and is developed with a single storey industrial warehouse with associated external hardstands, parking areas and internal driveways.

The intended outcome of the PPR is to permit high rise residential and mixed use development outcomes up to 101 metres in height (28 storeys) on the subject land, as conceptually indicated in the accompanying 'Campbelltown Northern Precinct Plan – Urban Design Study' and addendum report (attachments 2 and 3). This supporting study and precinct plan is aspirational in nature, and has not been prepared or endorsed by Council or other affected landowners. In this respect, the PPR does not seek any planning amendments beyond the boundary of the subject site.

This report provides an assessment of the PPR to assist Councillors in deciding whether the PPR should be supported by Council and forwarded to the Department of Planning, Industry and Environment (DPIE) for a Gateway Determination and public exhibition.

2. Site Description

The subject site is located on the corner of Farrow Road and Badgally Road, on the north-western side of Campbelltown Railway Station, directly across Farrow Road from the entry/exit points into the station. The site has an area of 2.84 hectares, and is generally rectangular in shape. The site has a frontage to Farrow Road of approximately 200 metres, a frontage to Badgally Road of approximately 110 metres, and a frontage to Bow Bowing Creek of approximately 223 metres.

The site contains a metal and brick warehouse building with a floor area of approximately 10,543sqm. Areas around the northern and western sides of the warehouse are used for parking, loading and storage. The site also contains two rows of trees; one along the site's Badgally Road frontage and one along its frontage to Bow Bowing Creek.

To the north of the site beyond Bow Bowling Creek are industrial, retail and commercial land uses along Blaxland Road and Badgally Road. To the east of the site beyond Badgally Road are industrial and bulky goods land uses. To the south of the site beyond Farrow Road and the railway line is a commuter carpark and Campbelltown Railway Station, including pedestrian access via stairs and a lift. To the west of the site is a large vacant parcel of Council-owned land, beyond which is the main commuter car park on the northern side of the railway line.

3. The Planning Proposal Request

The PPR seeks the following changes to CLEP 2015:

- a. Removal of the subject site from the “Deferred Matters” area on the Land Application Map.
- b. Amend the zoning of the site from 4(b) – Industrial B (which applies under CLEP 2002 because the site is within a deferred area) to B4 Mixed Use.
- c. Amend the Height of Buildings Map to apply a series of height limits across the site, ranging from 63 metres to 101 metres (18 to 28 storeys).
- d. Add a Clause 41 to “Schedule 1: Additional Permitted Uses” of CLEP 2015, to exempt residential flat buildings on the site adjacent to Bow Bowling Creek from having to comply with Clause 7.9 of the CLEP, which requires that buildings in the B4 zone have an active street frontage and contain only non-residential land uses on the ground floor.

The PPR includes an urban design study, addendum report and accompanying Precinct Plan, prepared by the applicant to provide a contextual development strategy for how the subject site and nearby sites in the area could be collectively developed as a precinct if the PPR for the subject site was supported. The PPR documentation indicates that future development resulting from the proposed rezoning could facilitate an estimated 1200 new dwellings and potentially 1150 – 1500 jobs, however these figures are based upon a number of assumptions for the future development of the broader precinct as provided within the accompanying urban design study.

The accompanying study, addendum report and precinct plan show a broader land use vision for the surrounding industrial land as prepared by the proponent. The supporting study and precinct plan provide a broad land use vision that is aspirational in nature, and has not been prepared or endorsed by Council or other affected landowners. In this respect, the PPR does not seek any planning amendments beyond the boundary of the subject site.

4. Assessment – State Planning Policies

The following state planning policies are relevant to the assessment of the PPR as outlined below.

4.1 Greater Sydney Region Plan 2018 – A Metropolis of Three Cities

The Greater Sydney Region Plan (GSRP) has been prepared by the NSW State Government to guide land use planning decisions over the next 40 years in order to achieve a common goal of having a metropolis of three cities (Eastern, Central and Western). The GSRP is built on a vision of three cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places.

The Plan sets a strategy for accommodating Sydney's future population growth and identifies the need to deliver 725,000 additional homes and create 817,000 jobs by 2036.

Four key components have been identified within the document:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

The overarching theme of the Plan is to shift from a focus on radial convergence into the Eastern Harbour City to a model of self-containment within each of the three cities, based on the concept of the 30 minute city whereby residents should have access to a metropolitan centre/cluster within 30 minutes of their homes.

Whilst the proposal would increase the number of homes within very close proximity to the Campbelltown CBD, it would also exacerbate the imbalance of homes and jobs within the Campbelltown LGA and the Western Parkland City broadly (only 34 per cent of employed residents of the Campbelltown LGA work in the area). The proposal would sterilise the employment potential of the land, diminishing work opportunities close to home for residents of the Campbelltown LGA and the Western Parkland City. This outcome would be inconsistent with the 30 minute vision of the GSRP to achieve greater self-containment of employment for the City of Campbelltown.

The assessment of the PPR against the most relevant strategies and objectives of the GSRP is summarised in the table below.

Strategy/objective of the Greater Sydney Region Plan 2018	Assessment of Proposal against strategy/objective
<p>Objective 22: Investment and business activity in centres</p> <p>The urban structure to support the metropolis of three cities needs to give people access to a large number and range of jobs and services delivering a well-connected city – a 30-minute city.</p> <p>Campbelltown-Macarthur forms part of the metropolitan cluster within the Western Parkland City and will deliver the metropolitan functions of providing concentrations of higher order jobs and a wide range of goods and services.</p> <p>Existing centres: Expansion options will need to consider building heights and outward growth. In some cases, directly adjacent industrial land may be appropriate for centre expansions to accommodate businesses.</p>	<p>The subject land is a key site located adjacent to the train station and City Centre and has potential to provide employment-generating commercial activities and population services to benefit residents of the Campbelltown LGA over time, should Council decide to expand the City Centre to the western side of the railway line.</p> <p>The rezoning of the subject land to permit a predominantly residential development on the subject site would be inconsistent with the direction of growing Campbelltown as a commercially-focused centre, as it would sterilise this important site's ability to provide a far more meaningful contribution towards this goal.</p> <p>As there is already an abundance of land within and around the city centre that is able to accommodate high density residential and mixed use residential development, a more suitable outcome for the subject site would be to either retain the site as industrial land or</p>

	<p>rezone it to allow for a land use outcome that better aligns with the objective of enhancing Campbelltown's commercial focus.</p> <p>The future expansion of the Campbelltown CBD to the western side of the railway line is an outcome that is envisaged by the Reimagining Campbelltown City Centre Master Plan and the Campbelltown Precinct Plan within the Glenfield to Macarthur Corridor Strategy. However, the precise land use outcomes for this precinct are yet to be determined and are dependent on ongoing strategic planning work.</p> <p>This directive states specifically that centre expansion may be appropriate to accommodate businesses (i.e. not residential development). The proposal is supported by a concept plan indicating that 25,350sqm of non-residential floor space would be provided. This outcome would result in a reduction of land/floor space available to accommodate businesses, as the site currently has 28,400sqm of industrial land. The incremental expansion of the Campbelltown CBD that the PPR proposes would be largely for the purpose of accommodating additional residential development and is therefore considered to be inconsistent with this section of the Plan.</p>
<p>Strategy 22.1 Provide access to jobs, goods and services in centre</p> <p>Attracting significant investment and business activity in strategic centres to provide jobs growth</p> <p>Creating the conditions for residential development within strategic centres and within walking distance (up to ten minutes), but not at the expense of the attraction and growth of jobs, retailing and services.</p>	<p>Whilst continuing residential development is important to the growth of Campbelltown-Macarthur as a regional city centre, there is sufficient land zoned within and near the city centre to provide for additional housing over the next 20 years.</p> <p>The subject land is a key site located adjacent to Campbelltown Railway Station and the city centre, and has potential to provide land uses that generate economic activity and employment for the benefit of residents of the Campbelltown LGA. The rezoning of the subject land to permit a predominantly residential development on the subject site would be at the expense of the attraction and growth of jobs, retailing and services.</p> <p>The continuation of or expansion of employment-generating land uses on the subject land would therefore better support</p>

	the residential communities in and around the Campbelltown-Macarthur regional city centre. Accordingly, the PPR is not considered to be consistent with this objective.
<p>Objective 23: Industrial and urban services land is planned, retained and managed.</p> <p>All existing industrial and urban services land should be safeguarded from competing pressures, especially residential and mixed-use zones. This approach retains this land for economic activities required for Greater Sydney's operation, such as urban services. Specifically these industrial lands are required for economic and employment purposes. Therefore the number of jobs should not be the primary objective – rather a mix of economic outcomes that support the city and population. The management of these lands should accommodate evolving business practices and changes in needs for urban services from the surrounding community and businesses.</p> <p>A review of industrial land adjacent to train stations, which would normally be considered a preferred location for conversion to residential development, reveals there are only a few sites remaining across Greater Sydney. Further, this industrial land adjacent to train stations is, in the main, part of large intact industrial precincts or directly linked to the freight rail network and therefore highly valuable industrial land – it is not suitable for conversion to residential.</p>	<p>The subject land is within an existing a large intact industrial precinct adjacent to Campbelltown Station that is zoned for industrial land uses. The proposed rezoning of this industrial land to mixed-use (with a predominantly residential outcome) would be inconsistent with this objective. Whilst the commercial component of a future mixed-use development may have a higher employment density than that of the site's current industrial use, this objective makes clear that the number of jobs should not be the primary objective. Rather, economic diversity is of paramount importance. At present, the area surrounding Campbelltown station has a balanced supply of four different land use zones that support different types of economic activity and employment (B3 Commercial Core, B4 Mixed Use, B5 Business Development and 4(b) Industrial B/IN2 Light Industrial), which are separated/delineated by the railway line and regional roads so as to create economic agglomerations and control amenity impacts. The proposed rezoning of this industrial land to mixed use with a predominantly residential outcome would disrupt this balance and erode the existing light industrial agglomeration on the western side of the railway line.</p> <p>The proposal is therefore considered to be inconsistent with this objective of properly planning, retaining and managing industrial and urban services land and preventing industrial land adjacent to train stations being converted to residential land.</p>
<p>Strategy 23.2: Consider office development in industrial zones where it does not compromise industrial or urban services activities in the South and Western City Districts.</p> <p>Innovative approaches in the South and Western City Districts may present opportunities where office uses can be compatible on certain industrial and urban services land. This could facilitate the attraction of knowledge businesses and a broader diversity of jobs close to home.</p>	<p>The subject site, given its location adjacent to the Campbelltown train station and city centre and its associated high level of accessibility, has the opportunity to achieve an outcome that would be consistent with this strategy.</p> <p>However, the proposed rezoning of the land to allow a mostly residential development on the subject site with minimal business activity does not capitalise on this opportunity. The proposal would be inconsistent with the goal of attracting knowledge business and a broader diversity of jobs close to home.</p>

The above strategies and objectives of the GSRP support the site being retained and managed as industrial land for employment generating land uses.

The proposed rezoning of the land to allow for predominantly residential outcomes on the site with limited business activity does not capitalise on the strategic importance of the site to promote employment growth for the Campbelltown City Centre and is therefore considered to be inconsistent with the above objectives and strategies of the GSRP.

4.2 Western City District Plan

As part of the NSW State Government's GSRP, Campbelltown is identified as a metropolitan cluster and health and education precinct in the Western City District Plan (WCDP). The WCDP provides relevant planning priorities for consideration relating to infrastructure and collaboration, liveability, productivity and sustainability, and is a relevant consideration for the subject PPR.

An assessment of the PPR in accordance with the relevant planning priorities of the WCDP is provided in the table below.

Planning Priority	Assessment of Proposal against priority
W1 – Planning for a city supported by infrastructure	<p>The site benefits from its location adjacent to Campbelltown station which is a key piece of infrastructure that would support any proposal for intensification of development on the site.</p> <p>Preliminary investigations have revealed that the planned bridge between Broughton and Badgally Streets over the railway line will require land from the subject site as the existing road corridor is not wide enough. However, the precise extent of land required at this stage is unknown. Therefore, the PPR is considered to be premature in the sense that whilst investigations are currently ongoing, Council at present does not have information sufficient to depict the necessary road corridor width on any amended zoning map or land acquisition map.</p>
W3 – Providing services and social infrastructure to meet people's changing needs	The proposal is supported by a concept plan that indicates that a quantum of floor space within the mixed-use development that would ultimately be developed on the site could be devoted to community-based land uses.
W5 – Providing housing supply, choice and affordability with access to jobs, services and public transport	The PPR is partly consistent with this Planning Priority as it would provide a large amount of housing supply in a location that is highly accessible to public transport. The site itself is also highly accessible to existing jobs, given its location within an existing industrial precinct and proximity to the Campbelltown CBD. However, Campbelltown has an imbalance between homes and jobs in the form of a large deficit of jobs, and the proposal's heavy skew towards residential development would exacerbate this imbalance.

	<p>Therefore, whilst the site itself is close to existing businesses, there is not an abundance of employment opportunities in Campbelltown, and the proposal would result in a net loss of employment land/floor space. The proposal does not assist in the achievement of the broader goal for Western Sydney to achieve the alignment of housing supply with employment opportunities, and it is therefore inconsistent with this Planning Priority.</p>
W6 – Creating and renewing great places and local centres, and respecting the District’s heritage	<p>The Campbelltown CBD, located on the eastern side of Campbelltown train station, currently has an abundance of land that is zoned for residential and mixed use development. It is necessary for land within the CBD to be redeveloped in order for the CBD as a whole to undergo urban renewal. Allowing an expansion of the CBD into the land to the west of the railway line is likely to delay or prevent the redevelopment of land within the CBD that is currently able to accommodate residential and mixed use development by absorbing demand for residential and commercial floor space that could otherwise be supplied within the existing CBD. The proposal would therefore delay or prevent the renewal of the Campbelltown CBD, and is inconsistent with this Planning Priority.</p> <p>In addition, a spot rezoning of the subject site on its own would lead in to land use conflicts, poor residential amenity and unsightly views for residents of the site in the short and medium term, given that the locality surrounding the site contains several large industrial land uses. This would not be conducive to the creation of great places that the Planning Priority aims to achieve.</p>
W7 – Establishing the land use and transport structure to deliver a liveable, productive and sustainable Western Parkland City	<p>The site benefits from its location adjacent to Campbelltown station which is a key piece of infrastructure that would support any proposal for intensification of development on the site.</p> <p>Preliminary investigations have revealed that the planned bridge between Broughton and Badgally Streets over the railway line will require land from the subject site as the existing road corridor is not wide enough. However, the precise extent of land required at this stage is unknown. Therefore, the PPR is considered to be premature in the sense that whilst investigations are currently ongoing, Council at present does not have information sufficient to depict the necessary road corridor width on any amended zoning map or land acquisition map.</p>

W9 – Growing and strengthening the metropolitan cluster	The PPR is partly consistent with this Planning Priority as it would grow the metropolitan cluster of Campbelltown's CBD by extending it to the western side of the railway line. However, it is likely to weaken rather than strengthen the existing metropolitan cluster in the medium term by absorbing demand for residential and commercial floor space that could otherwise be supplied within the existing CBD and preventing or delaying the redevelopment of existing land within the CBD.
W10 – Maximising freight and logistics opportunities and planning and managing industrial and urban services land	The PPR is clearly inconsistent with this Planning Priority, as it would lead to the loss of 2.84 hectares of valuable employment-generating industrial/urban services land.
W11 – Growing investment, business opportunities and jobs in strategic centres	The PPR is clearly inconsistent with this Planning Priority, as whilst it would provide some commercial floor space, it would represent a net loss of employment land/floor space on the subject site, given that the volume of indicative employment land/floor space would be less than that of the site in its existing form. The subject site, given its highly accessible location, represents a unique opportunity to contribute meaningfully to the achievement of business and jobs growth in the strategic centre of Campbelltown. The current proposal fails to take advantage of this opportunity and would instead worsen the imbalance of homes and jobs within the Campbelltown LGA. The proposal is therefore inconsistent with this Planning Priority.
W12 – Protecting and improving the health and enjoyment of the District's waterways	<p>One of the aims of the Reimagining Campbelltown City Centre Master Plan is to deliver a widened and rehabilitated Bow Bowing Creek corridor in order to transform this space into a public open space/transport corridor, accessible to pedestrian and cyclists. This would allow the health of the creek to be improved and enable the creek to be enjoyed by the community.</p> <p>The zoning map submitted with the PPR does not reflect this vision, as it does not make provision for Public Recreation land to be provided adjacent to the creek. Accordingly, the PPR is considered to be inconsistent with this Planning Priority.</p>
W15 – Increasing urban tree canopy cover and delivering Green Grid connections	<p>Increasing the urban tree canopy cover on the site is an outcome that is able to be achieved should the subject site ultimately be rezoned and redeveloped. To assist this it would be necessary to prepare a site-specific Development Control Plan.</p> <p>In terms of delivering Green Grid connections, one of the aims of Reimagining Campbelltown City</p>

	<p>Centre Master Plan is to deliver a widened and rehabilitated Bow Bowing Creek corridor in order to transform this space into a public open space/transport corridor, accessible to pedestrian and cyclists. The zoning map submitted with the PPR does not reflect this vision, as it does not make provision for Public Recreation land to be provided adjacent to the creek. Accordingly, the PPR is considered to be inconsistent with this Planning Priority.</p>
W18 – Delivering high quality open space	<p>The proposal is supported by a concept plan showing a number of parks within the area to the west of the railway line. One of these open space areas is located on the subject site and the rest are indicatively located on other land.</p> <p>The conceptual open space area on the subject site is proposed to be zoned B4 Mixed Use Zone rather than being delineated an open space zone. It is therefore unclear as to how the PPR would secure and deliver on this open space outcome through the proposed land zoning. It is also noted that the proposed building height map requests a maximum building height of 63-64 metres for the part of the site that corresponds to the indicative location of the park.</p> <p>Given the context of the site within an industrial precinct the western side of the rail line, any open space park delivered on the site would potentially have a low level of amenity given land use conflicts with the surrounding industrial uses.</p> <p>For these reasons, there is uncertainty that the conceptual open space area indicated on the PPR would be delivered to a high quality outcome in accordance with this Planning Priority.</p>
W19 – Reducing carbon emissions and managing energy, water and waste efficiently	<p>The PPR is partly consistent with this Planning Priority, to the extent that high-density residential development is inherently more efficient than low-density residential or low density industrial development in terms of per capita carbon emissions and energy use. However, as the proposal would exacerbate the existing imbalance of local jobs and homes, it would create the need for more transport movement within Sydney as a whole than would otherwise be the case if an outcome were achieved that led to greater self-containment of employment within Campbelltown.</p> <p>Furthermore, the proposal on this location would create an isolated community that is not directly connected to the existing CBD, thus increasing the demand for vehicle use to access day to day services.</p>

A number of inconsistencies between the PPR and the WCDP have been identified as outlined above. For these reasons, the PPR is considered to be generally inconsistent with the WCDP.

4.3 Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Area

The Department of Planning, Infrastructure and Environment (DPIE) has prepared Greater Macarthur 2040: An Interim Plan, which sets out the strategic planning framework for the Greater Macarthur Growth Area.

The plan sets a long term vision and provides a framework for the Greater Macarthur Growth Area, comprising the urban renewal of the rail corridor from Glenfield to Macarthur, and the development of planned land release areas from Menangle Park to Appin. The broad aims of the Plan are summarised as follows:

- economic development opportunities through an economically strong Campbelltown-Macarthur with new centres at Glenfield, Menangle Park, Gilead and Appin
- provide new homes and local centres
- improve transport connections
- transport-oriented development in both urban renewal and land release precincts
- promotion of housing diversity
- provision of suitable open spaces and amenities
- protecting the koala population

Through the aims, the Greater Macarthur 2040 Plan also sets out actions that will help meet the vision identified within the document. The PPR has been assessed against the 'Place', 'Land Use' and 'Infrastructure' aims of the Plan that are relevant to Campbelltown and the land use outcomes proposed. Details are provided below.

Place

With regard to place, the Plan aims to achieve the following in relation to the suburb of Campbelltown:

- Provide a range of building heights, with high rise buildings close to the station to maximise pedestrian activity and increase trade for local businesses.
- Plan for a large floor plate, campus-style office park west of the station.

With regard to the first of these aims, the proposal would provide a range of building heights, with the highest buildings located directly adjacent to the train station, and these parts of the site would have the highest maximum building heights in the entire City. However, Council has recently undertaken detailed height modelling for the Leumeah-Campbelltown-Macarthur City Centre as part of Reimagining Campbelltown City Centre Master Plan, which does not identify the subject site as having the tallest buildings in the City. This is discussed in further detail later in this report.

With regard to the second of these aims, the proposal is inconsistent with the creation of a large floor plate campus-style office park on the western side of Campbelltown train station. Should the proposal for a predominantly high-density residential development proceed, it would thwart this aim by sterilising the land's ability to become part of an office park in the future. The subject site is the closest site to the train station, making it the site most likely to be feasible for an office park development, and if the site is developed for predominantly residential purposes, it would also be likely to create an undesirable precedent for similar inappropriate development, making it unlikely that an office park would ever be created on the western side of the station.

Land use

With regard to land use, the Plan aims to achieve the following aims in relation to the suburb of Campbelltown:

- i. Campbelltown will offer higher-order civic, cultural, employment, residential and retail opportunities. It will include 3600 additional dwellings with an activated commercial and retail core.

The PPR indicates that development of the subject site in line with the zoning and maximum building heights that are sought would result in an estimated additional 1200 dwellings. This equates to 33 per cent of Campbelltown's target for housing growth in the city centre to 2036 being provided on a single site, which would lead to a disproportionate amount of future housing demand being provided on the site. If the subject site were to supply 1200 dwellings, this would significantly exceed planned housing supply and associated infrastructure provision, worsen the existing imbalance between housing and jobs within the Campbelltown LGA, and be potentially detrimental to the activation of Queen Street through shop-top housing redevelopments.

Shifting the renewal focus from the core area of the CBD to the western industrial side of the railway would therefore be inconsistent with the above land use aims of the Plan.

Infrastructure

With regard to infrastructure, the Plan aims to achieve the following in relation to the suburb of Campbelltown that is directly relevant to the subject site:

- ii. Investigate connection from Broughton Street to Badgally Road and extension of Badgally Road over rail line

Preliminary investigations have revealed that the planned bridge between Broughton Street and Badgally Road over the railway line will require land from the subject site as the existing road corridor is not wide enough. However, the precise extent of land required at this stage is unknown. Therefore, the PPR is considered to be premature in the sense that whilst investigations are currently ongoing, Council at present does not have information sufficient to depict the necessary road corridor width on any amended zoning map or land acquisition map.

4.4 Glenfield to Macarthur Urban Renewal Corridor Strategy

The Glenfield to Macarthur Urban Renewal Corridor Strategy (Corridor Strategy) establishes a high level strategic planning framework to guide future housing, employment opportunities and infrastructure delivery along the Campbelltown rail corridor, forming part of the Greater Macarthur Priority Growth Area.

The subject site is within the Campbelltown Precinct Plan, being one of the seven train station precincts identified under the Corridor Strategy. The Campbelltown Precinct Plan provides the vision for the future development of the city centre having regard to the long term housing and employment needs for the area until 2036. As part of the desired future character and built form, the subject site is identified under the Precinct Plan for high rise residential (seven storeys and over) as described below:

This area could accommodate apartment housing to deliver a high level of amenity for the existing and future residents. This could comprise seven plus storey apartment buildings, with potential for communal open spaces and shared facilities. Detailed planning would be required to identify appropriate height and built form outcomes. The new dwellings should be carefully designed to integrate with the existing streetscape. Building design should maximise climate control and amenity for occupants and capitalise on district views.

The potential for seven plus storey apartment buildings on the subject land is a long term vision and, as outlined above, requires further detailed planning work to determine appropriate height and built form outcomes. In this respect, the Precinct Plan also identifies the opportunity for a large floor plate, campus style office park west of the station, which could reasonably include the subject land.

The Campbelltown Precinct Plan in the Corridor Strategy was adopted in 2017. Since this time the preparation of the GSRP and WCDP has provided a new planning framework for housing and employment delivery in the local government areas of the Sydney Region. Council has undertaken extensive work under this new planning framework, including preparation and endorsement of the LSPS, review of CLEP 2015, preparation of the Draft Strategic Review of Employment Lands Strategy, and recently endorsed Campbelltown Local Housing Strategy (LHS). These planning policies and strategies confirm Council's direction for the management of housing and employment land use outcomes on the subject land, consistent with the Reimagining Campbelltown City Centre Master Plan.

The Reimagining Campbelltown City Centre Master Plan provides a clear direction for future land use outcomes in the precinct, identifying the subject land as forming part of a future tech and city servicing precinct. This future tech and city servicing land use outcome would be consistent with the Campbelltown LHS, endorsed by Council on 29 September 2020. The LHS confirms capacity for high density shop-top housing within the existing B3 and B4 zones of the city centre on the eastern side of the railway line, underpinning the planned revitalisation of the Queen Street commercial precinct. The subject PPR rezoning is therefore not considered justified given that future housing supply would disrupt the strategic delivery of housing within the B3 and B4 zones of the city centre, including the development and revitalisation of Queen Street.

The recently exhibited Draft Campbelltown Strategic Review of Employment Lands Strategy also supports the retention of the existing industrial zoned land on the western side of Campbelltown Railway Station encompassing the subject site. This area has been identified for employment opportunities for residents in the short term. This employment objective is consistent with the updated vision for the City Centre under the Reimagining Campbelltown City Centre Master Plan recently exhibited by Council, identifying the potential of the subject land to form part of a broader Tech and City Servicing Precinct.

The detailed planning work for the city centre undertaken by Council, as contemplated by the Campbelltown Precinct Plan, supports the retention of the subject land for employment generating land uses and the promotion of city centre residential apartments within the existing zoned areas of the city centre. This planning outcome is promoted under the Reimagining Campbelltown City Centre Masterplan, and is consistent with the updated direction provided in the GSRP and WCDP to retain and manage existing employment zones near the Campbelltown City Centre. Accordingly, the PPR is not considered warranted on the basis of the long term land use vision under the Campbelltown Precinct Plan for high rise residential (seven plus storeys).

4.5 State Environmental Planning Policies

The details of the consistency of the PPR with relevant State Environmental Planning Policies (SEPPs) and Deemed SEPPs is provided in the table below.

State Environmental Planning Policies (SEPPs)	Consistency
SEPP No 19 - Bushland in Urban Areas	The site does not contain any known significant vegetation.
SEPP No 55 - Remediation of Land	Consistent. A Preliminary Site Investigation is provided in Appendix 5. Based on the work undertaken in the above mentioned assessment, the land to which this PPR relates is considered to be capable of being made suitable for the land use purposes which are proposed.
SEPP 64 – Advertising and Signage	Consistent. Any future DA for mixed-use development would be subject to the provisions of this SEPP.
SEPP No 65 - Design Quality of Residential Apartment Development	Consistent. Any future DA for a residential flat building and/ or shop top housing on the site would be subject to the provisions of this SEPP.
SEPP (Building Sustainability Index: BASIX) 2004	Consistent. Any future DA for a residential flat building and/ or shop top housing on the site would be subject to the provisions of this SEPP.
SEPP (Affordable Rental Housing) 2009	Consistent. Future development on the site may incorporate affordable housing which would need to be relevantly assessed under the provisions of this SEPP.
SEPP (Infrastructure) 2007	Consistent. Any future DA would be subject to the provisions of this SEPP.
SEPP (State and Regional Development) 2011	Consistent. Any future development constituted as Regional Development will

	be determined by the Sydney Western City Planning Panel.
(Deemed SEPP) Greater Metropolitan Regional Environmental Plan No 2 – Georges River Catchment	Consistent. Future DAs will be subject to detailed assessment relating to stormwater and drainage to mitigate any adverse impact on the water quality and river flows of the Georges River and its tributaries.
SEPP (Koala Habitat Protection) 2019	The site does not contain any known koala habitat.

4.6 Section 9.1 Local Planning Directions

Section 9.1 of the EP&A Act allows the Minister responsible for planning to provide direction to Council in relation to the amendment or preparation of draft local environmental plans. The Directions that are relevant to this PPR are outlined below.

- Direction 1.1 Business and Industrial Zones
- Direction 3.4 Integrated Land Use and Transport
- Direction 4.3 Flood Prone Land
- Direction 5.10 Implementation of Regional Plans
- Direction 6.2 Reserving Land for Public Purposes
- Direction 7.1 Implementation of a 'A Plan for Growing Sydney'
- Direction 7.7 Implementation of Glenfield to Macarthur Urban Renewal Corridor

A number of inconsistencies with the relevant Directions have been identified as outlined below.

• Direction 1.1 Business and Industrial Zones

Objectives

The objectives of this direction are to:

- (a) encourage employment growth in suitable locations
- (b) protect employment land in business and industrial zones, and
- (c) support the viability of identified centres

The Direction states that the planning proposal must:

- a) give effect to the objectives of this direction
- b) retain the areas and locations of existing business and industrial zones
- c) not reduce the total potential floor space area for employment uses and related public services in business zones
- d) not reduce the total potential floor space area for industrial uses in industrial zones, and
- e) ensure that proposed new employment areas are in accordance with a strategy that is approved by the Secretary of the Department of Planning and Environment

Comment

The PPR is considered to be inconsistent with the objectives of Direction 1.1 given the net loss of employment land through loss of the existing industrial/employment zone, potential impacts on the planned revitalisation of Queen Street and the Campbelltown City Centre, and potential land use conflicts arising from locating high density residential development amidst an industrial zone.

- **Direction 5.10 Implementation of Regional Plans**

Objectives

The objective of this direction is to give legal effect to the vision, land use strategy, goals, directions and actions contained in Regional Plans.

The Direction states that Planning Proposals must be consistent with a Regional Plan released by the Minister for Planning.

Comment

The strategies and objectives of the GSRP and WCDP support the site being retained and managed as industrial land for employment generating land uses. Further, there is considered to be no justification to introduce high density residential land use outcomes on the land given established capacity within the Campbelltown City Centre to accommodate projected dwelling targets to 2040 without the conversion of this land from employment to residential uses.

The proposed rezoning of the land to allow for predominantly residential outcomes on the site with limited business activity does not capitalise on the strategic importance of the site to promote employment growth for the Campbelltown City Centre and is therefore considered to be inconsistent with the relevant objectives and strategies of the GSRP and WCDP.

- **Direction 7.1 Implementation of A Plan for Growing Sydney**

This direction requires that planning proposals be consistent with the NSW Government's "A Plan for Growing Sydney" published in December 2014.

Comment:

A Plan for Growing Sydney pre-dates the updated planning framework for the Sydney Region, provided through the establishment of the Greater Sydney Commission and making of the GSRP and the WCDP as discussed above.

Campbelltown-Macarthur is identified as a strategic centre under A Plan for Growing Sydney. The strategic actions of the Plan include the growth of strategic centres to provide more jobs closer to home.

The Plan states that Campbelltown-Macarthur will be a focus for employment, services and transport connections as part of a network of strategic centres across Western Sydney. Importantly, the priorities for Campbelltown-Macarthur include the investigation of potential business park opportunities on the western side of the train line.

The proposed rezoning of the land to provide for predominantly residential outcomes on the western side of the railway line does not capitalise on the strategic importance of the site to promote employment growth for the Campbelltown City Centre, as identified under “A Plan for Growing Sydney”, and is therefore considered to be inconsistent with Direction 7.1.

5. Assessment - Local Planning Policies

The following Local Plans and strategic planning policies are relevant to the consideration of the PPR, and an assessment of the PPR against these plans and strategies is outlined below.

5.1 Campbelltown Community Strategic Plan 2027

Campbelltown Community Strategic Plan 2027 (CSP) is Council's highest level strategic plan, and outlines the strategic direction of Council for a 10 year period based on the feedback of the local community and research on successful and resilient communities.

The purpose of the CSP is to identify the community's main priorities and aspirations for the future and to plan an approach to achieve these goals.

The CSP has been structured to address four key outcomes that Council and other stakeholders will work to achieve. These outcomes are:

- Outcome 1: A vibrant, liveable city
- Outcome 2: A respected and protected natural environment
- Outcome 3: A thriving, attractive city
- Outcome 4: A successful city

These outcomes will be achieved through the implementation of 27 strategies identified within the CSP.

The following strategies of the CSP align with ‘Outcome Three: A Thriving Attractive City’ and are considered the most relevant in the consideration of this PPR:

3.1- Support the resilience, growth and diversity of the local economy

3.2- Ensure that service provision supports the community to achieve and meets their needs

3.3- Become an innovative city where advances in technology, creativity and community participation are nurtured and embraced

3.4- Retain and expand existing businesses and attract new enterprises to Campbelltown, offering opportunities for a diverse workforce including professional, technology and knowledge based skills and creative capacity

3.5- Support for new education opportunities that match workforce skill sets with emerging economic needs underwritten by creative entrepreneurship and innovation capacity within the local community

3.6- Develop tourism opportunities and promote Campbelltown as a destination

The above strategies encourage and support the development of the local economy through business innovation and growth. The present industrial zoning of the land under LEP 2002, and as proposed to be retained under CLEP 2015, is consistent with these strategies by retaining employment opportunities in the short term, and preserving strategically located landholdings for future redevelopment and employment growth in the long term.

The subject site, given its highly accessible location, represents a unique opportunity to contribute meaningfully to the attraction of new enterprises to Campbelltown in the professional, technology, knowledge based and creative industries. The subject PPR seeks to facilitate predominantly high density residential outcomes on the site, which does not achieve this employment growth outcome. The current proposal, because of its heavy skew towards residential development, fails to take advantage of this opportunity and would instead worsen the imbalance of homes and jobs within the Campbelltown LGA. Accordingly, the proposal is not considered to be consistent with the CSP.

5.2 Campbelltown Community Participation Plan (CPP)

Community participation is an overarching term covering how Council engages the community in its work under the EP&A Act. The purpose of the Campbelltown Community Participation Plan (CPP) is to provide a single document that the community can access which sets out how they can participate in planning matters. This includes plan making, development assessment, strategy development and planning proposals that are required to be assessed and determined by Council, Local or Regional Planning Panels.

Under Council's CCP, Planning Proposals are required to be publicly exhibited for a period of 28 days following a Gateway determination. Should Council resolve to support the PPR and submit a Planning Proposal to DPIE (which this report does not recommend), the Planning Proposal would be exhibited in accordance with the provisions of the CCP if a Gateway Determination were received.

5.3 Campbelltown Local Strategic Planning Statement

The Campbelltown Local Strategic Planning Statement (LSPS) came into effect on 31 March, 2020. All planning proposals are now required to demonstrate consistency with the LSPS.

A number of actions within the LSPS are relevant to the proposal, and an assessment of the proposal against these actions is contained in the table below.

Action	Assessment of Proposal against action
1.11 Support the creation of walkable neighbourhoods to enhance community health and wellbeing and create liveable, sustainable urban areas	The PPR would lead to the creation of a walkable neighbourhood, and is therefore consistent with this action.
1.17 Ensure open space is well connected via pedestrian and cycle links	The Bow Bowling Creek corridor has been identified by Council through the Reimagining Campbelltown document as an important pedestrian/cycle link through the City that can link areas of open space to each other. It is planned that a widened and rehabilitated Bow Bowling Creek corridor will be delivered in order to transform the creek and its surrounds into a public open space/transport corridor for pedestrian and cyclists. The zoning

	map submitted with the PPR does not reflect this vision, as it does not make provision for public recreation land to be provided adjacent to the creek. The proposal is therefore inconsistent with this action.
1.24 Work in partnership with Government to enable urban growth supported by infrastructure with a focus on connectivity through sustainable land use integrated with transport planning, and transit-orientated development	The PPR is partly consistent with this action in that if the proposal were to be progressed, Council and the Government would be working in partnership to enable urban growth on the subject site, which has a high degree of connectivity and accessibility to transport. However, given that the proposed rezoning of land would fracture an existing agglomeration of employment-generating industrial land exacerbate the existing imbalance of jobs and homes within the Campbelltown LGA, the proposal is not considered to be sustainable as this action requires.
2.5 Contain urban development to existing urban areas and within identified growth and urban investigation areas, in order to protect the functions and values of scenic lands, environmentally sensitive lands and the Metropolitan Rural Area	The proposal is generally consistent with this action, given that it seeks to rezone existing urban land for higher density land uses, and would therefore not threaten the functions and values of scenic lands, environmentally sensitive lands and the Metropolitan Rural Area.
2.9 Work with the NSW Government to facilitate the strategic rezoning of land and the provision of associated infrastructure for identified urban growth and renewal areas, including identification of appropriate staging and alignment of infrastructure provision with anticipated growth	The PPR is largely inconsistent with this action. The proposal is not considered to be a “strategic rezoning of land” as it is inconsistent with the vast majority of the applicable strategic planning framework, as discussed in this report. In terms of infrastructure, the proposal fails to make adequate provision for a linear park along Bow Bowing Creek as identified in the Reimagining Campbelltown City Centre Master Plan, and is considered to be premature in the sense that the amount of land from the subject site required for road widening associated with the Broughton-Badgally Bridge is unknown. Further, given the absence of an adopted policy position for high-density redevelopment on the western side of Campbelltown station, the proposal is not presently aligned with the required provision of infrastructure in this locality.
2.12 Promote housing diversity through local planning controls and initiatives	The proposal is generally consistent with this action, given that it seeks to rezone existing urban land for higher density land uses.
2.15 Ensure that sufficient, quality and accessible open space is provided for new urban areas	The proposal is supported by a concept plan showing a number of parks within the area to the west of the railway line. One of these is located on the subject site and the rest are indicatively located on other land. However, the proposed zoning map included with the PPR shows the entire site as having a B4 Mixed Use zoning. Further, the proposed building height map indicates a maximum
2.16 Ensure that quality embellishment for passive and active recreation is provided to new and existing open space to service new	

<p>residential development and redevelopment of existing urban areas</p> <p>6.25 Work towards residents being a maximum of 400 metres from quality open space</p>	<p>building height of 63 metres for the part of the site that corresponds to the indicative location of the park, Accordingly, the proposed amendments to CLEP 2015 do not align with the indicative open space areas shown in the accompanying concept plan. This deficiency would need to be addressed part of the determination of the PPR should it be supported.</p> <p>It should be noted that any open space area delivered on the site would likely have a low level of amenity due to its close proximity to surrounding industrial land uses. Accordingly, the potential for land use conflicts between high density residential and industrial would ensue, resulting in an open space area that is unlikely to be “quality” as this action requires.</p> <p>A key aim of the Reimagining Campbelltown City Centre Master Plan is to deliver a widened and rehabilitated Bow Bowling Creek corridor in order to transform this space into a public open space/transport corridor, accessible to pedestrian and cyclists. The zoning map submitted with the Planning Proposal request does not reflect this vision, as it does not make provision for Public Recreation land to be provided adjacent to the creek.</p> <p>Given the above factors, the PPR is considered to be inconsistent with these actions.</p>
<p>2.17 Ensure open space is provided where it will experience maximum usage by residents, with maximum frontage to public streets and minimal impediments</p>	<p>The proposal is supported by a concept plan indicating that a new public park would be provided in a location accessible to public streets, and that a linear park would be provided. However, the zoning map submitted with the PPR does not align with this concept plan, meaning that there is no certainty that these outcomes would be delivered. This matter would need to be addressed as part of the determination process for the PPR should it be supported.</p>
<p>5.13 Investigate opportunities to rehabilitate existing waterways within the LGA to maximise the benefits to the community</p> <p>8.24 Facilitate blue and green projects to introduce water into the urban environment, reducing the impacts of the urban heat island effect and providing increased shade and canopy coverage</p>	<p>One of the aims of Reimagining Campbelltown is to deliver a widened and rehabilitated Bow Bowling Creek corridor in order to transform this space into a public open space/transport corridor, accessible to pedestrian and cyclists, which would give effect to this action. The zoning map submitted with the PPR does not reflect this vision, as it does not make provision for public recreation land to be provided adjacent to the creek, and the proposal is therefore inconsistent with this action. It is however noted that overall the development of the site in accordance with the plans provided would reduce</p>

	the overall site coverage by buildings providing a potential opportunity to increase canopy coverage.
7.11 Identify appropriate building heights through design requirements to ensure that solar access is not restricted in open space areas adjoining multi-storey developments	The PPR includes shadow diagrams prepared for indicative buildings at the building heights proposed (63 to 101 metres). These diagrams indicate that buildings at the maximum building height proposed would have overshadowing impacts upon the Council Civic Centre and Campbelltown Court House in the afternoon period. These two sites contain open space areas that would be significantly overshadowed by buildings at the maximum building height proposed. The proposal is therefore inconsistent with this action.
9.8 Promote the development and intensification of Campbelltown's existing agglomerations to boost productivity and competitive edge	The subject site is located within an existing agglomeration of industrial land that serves an important economic and employment function. The PPR would excise the subject site from this agglomeration and thereby have the effect of weakening it. The proposal is therefore inconsistent with this action.
10.5 Continue to recognise the dynamic and evolving nature of centres, their ability to become activated and integrated mixed use hubs which are highly productive and liveable places, and the potential of large and existing retail providers to offer local employment	The Campbelltown CBD, located on the eastern side of Campbelltown train station, currently has an abundance of land that is zoned for mixed use development. It is necessary for land within the CBD to be redeveloped in order for the CBD as a whole to evolve into an activated and integrated mixed use hub. Allowing an expansion of the CBD into the land to the west of the railway line is likely to delay or prevent the redevelopment of land within the CBD that is currently able to accommodate residential and mixed use development by absorbing demand for residential and commercial floor space that could otherwise be supplied within the existing CBD. The proposal would therefore delay or prevent the evolution of the Campbelltown CBD into an activated and integrated mixed use hub, and is therefore inconsistent with this action.

5.4 Reimagining Campbelltown

The Reimagining Campbelltown project commenced in late 2017. Phase 1 outlined the vision for the future of the Campbelltown, Macarthur and Leumeah stating that the economy and built form of these centres will need significant re-structuring to ensure that projected population growth can be accommodated across the Western Parkland City by 2036. This vision formed the basis of the Reimagining Campbelltown City Centre Master Plan.

At its meeting on 14 April 2020, Council resolved to endorse and exhibit Reimagining (Phase 2) - Campbelltown City Centre Master Plan 2020. The Plan was publicly exhibited until July 2020. A post exhibition report was received and noted by Council at the Council meeting on 13 October, 2020.

The vision for the plan is to elevate Campbelltown to the status of a Metropolitan CBD, a leading centre of health services, medical research and mid-tech activity that will be achieved through ambition, innovation and opportunity.

The vision for Reimagining Campbelltown City Centre is underpinned by a Place Framework. Comprising six strategic growth pillars and 25 commitments, it is the enduring decision-making framework to guide growth and investment for a more prosperous future. The six strategic growth pillars comprise the following:

1. Confident and Self Driven
2. Connected Place
3. Centre of Opportunity
4. No Grey to be Seen
5. City and Bush
6. The Good Life

An assessment of the PPR has been undertaken in accordance with the six strategic growth pillars and corresponding 25 commitments for growing the Campbelltown City Centre. Whilst the PPR is broadly consistent with a number of pillars and commitments, the following inconsistencies have been identified with the commitments under the strategic growth pillars (3) 'Centre of Opportunity', (5) 'City and Bush', and (6) 'The Good Life' as discussed below.

- **Commitment 3.1 - Cluster businesses to achieve economic benefits**

Campbelltown city centre is the engine room of the broader LGA. It comprises five economic precincts, each with a specific role and function – the core CBD, world class health, knowledge and innovation precinct, sports and entertainment precinct, cultural precinct and tech and city servicing innovation precinct.

The subject land is located within the tech and city servicing innovation precinct, being strategically located west of Campbelltown train station. The Reimagining Campbelltown City Centre Master Plan identifies this area for accommodating a range of tech, advanced and additive manufacturing and city servicing uses, as well as accommodation uses in the longer term. This mix of higher value industrial uses benefits from its high worker amenity, public space, ease of access to the Core CBD, and high public transport accessibility.

The PPR seeks to displace industrial uses on the subject land with predominantly high rise residential towers, with limited commercial uses at podium level facing the street. This outcome is inconsistent with Commitment 3.1 and the vision for a tech and city servicing precinct.

- **Commitment 3.2 - Intensify land use to promote a more efficient and productive economy**

The Campbelltown city centre makes the very most of its extensive land area. Medium and high intensity land uses are concentrated around key infrastructure (e.g. Campbelltown Hospital), while traditionally low intensity uses such as urban services and large format retail showrooms are accommodated in innovative medium and higher intensity buildings. More intensive land use in the city centre facilitates greater development opportunities, resident population and jobs, and better leverages the city centre's substantial infrastructure and assets.

The Reimagining Campbelltown City Centre Master Plan identifies the core CBD as accommodating the highest intensity land uses, located on the eastern side of Campbelltown Railway Station along the central section of Queen Street. Building envelopes within the core CBD precinct are determined by the height controls under CLEP 2015 which provide for maximum heights of between 32m and 45m for this precinct.

The PPR seeks amendment of CLEP 2015 to provide for height limits of between 63m and 101m for the subject land, outside the core CBD. This outcome is considered to be inconsistent with this commitment given that the proposed heights under the PPR significantly exceed the building heights permitted in the Core CBD, even substantially exceeding the planning proposal for the Campbelltown RSL site (which seeks 85m) which is located within the Core CBD.

- **Commitment 3.3 Increase local jobs**

Campbelltown residents have access to a diverse range of local employment opportunities in the City Centre which match their skillsets and qualifications. The city has evolved to provide extensive opportunities for high skilled knowledge jobs in its historically strong sectors of health, education and manufacturing, as well as plant and animal sciences, so residents who want to, can work in the city centre.

The high density residential outcomes envisaged under the PPR provide limited commercial and retail opportunities at ground/podium levels facing the street. This outcome is inconsistent with the promotion of high skilled knowledge jobs under the above commitment.

- **Commitment 5.3 - Create a memorable, legible and green built form which celebrates its 'City Centre in a valley' setting.**

Campbelltown City sits nestled in a valley, dissected by creeks and framed by green hills. This unique natural environment and connection to local setting has long shaped the city centre's evolution. Throughout the city's growth, the aesthetic, environmental and recreational values of the green spaces have remained at the heart of the city's identity and place values.

To ensure the city's green frame maintains significance as part of the urban experience, the city's future built form will need to consider impact to its visual context. The impact of new building height from key arrival viewpoints as well as regional and local high points (identified in the previous map) is to be minimised.

The building height guidance map for the City Centre identifies the distribution of height based on intensification of land, proximity to transport and access to amenity. The subject land is identified as the second lowest building height form on this map, recognising the vision for this land to be utilised for a tech and city servicing precinct providing high skilled knowledge jobs.

The proposed building heights under the PPR would significantly exceed the tallest building heights prescribed for the Core CBD on the eastern side of the Campbelltown Railway Station. Accordingly, the PPR is considered to be inconsistent with this commitment.

- **Commitment 6.1 – A City you can call home.**

Campbelltown city centre will be home to a strong and diverse community living in housing that supports social, economic and cultural wellbeing. There will be an array of housing choices, including affordable options for key workers and families. The city is inclusive and welcoming of new residents, migrants, students and visitors.

The master plan has capacity to deliver vibrant and liveable neighbourhoods, by accommodating an additional 15,609 homes across the three centres of Macarthur, Campbelltown and Leumeah. This housing capacity figure significantly exceeds the projected growth by DPIE to 2036 for the Campbelltown City Centre, and importantly, does not consider the subject land for housing provision given the focus for this area to accommodate a tech and city servicing innovation precinct.

Whilst Reimagining recognises the potential for future residential on the subject land, to be integrated as part of a tech and city servicing innovation precinct, the high density residential tower outcomes shown under the PPR do not align with this intent. Accordingly, the PPR is considered to be inconsistent with this commitment.

5.5 Campbelltown Local Environmental Plan 2015

Under Campbelltown Local Environmental Plan 2015, the site is identified as a “Deferred Matter” area meaning that the site remains zoned 4(b) - Industry B under the preceding local planning instrument, Campbelltown (Urban Area) Local Environmental Plan 2002 (LEP 2002).

Council has separately endorsed and exhibited a planning proposal for the review of the CLEP 2015 which proposes a number of updates to the plan, including the removal of the “Deferred Matters” areas from the CLEP 2015. Under this planning proposal, the site is proposed to be zoned to the equivalent IN2 Light Industrial zoning with a maximum building height of 19 metres.

This separate planning proposal to rezone the land to IN2 Light Industrial under has been endorsed by Council and public exhibition has been completed. Council have considered the submissions made in regards to the planning proposal and resolved to forward it (with changes that do not relate to the subject site) for finalisation. It is anticipated that the updated zone and height controls for the land will come into effect in a few months. The objectives of the IN2 Light Industrial zone continue to encourage land use outcomes that will contribute to economic and employment growth in the City of Campbelltown.

It is particularly noted that during the exhibition of the LEP review planning proposal there were three submissions from land owners in the vicinity of the subject land. These three submissions all sought different outcomes for the Blaxland Road precinct, including three different land use zones being B4 mixed use, B5 business development and IN1 General Industrial. The report to Council following receipt of these submissions advised that the future use of this precinct needs to be consistent with Reimagining Campbelltown City Centre Master Plan, which at that time was on public exhibition, and the outcomes of the employment lands strategy.

5.6 Employment Lands Study and Local Housing Strategy – CLEP 2015 Review

As part of the broader review and alignment of CLEP 2015 with the WCDP, Council has prepared the Campbelltown Local Housing Strategy and Draft Campbelltown Strategic Review of Employment Lands Strategy, which are directly relevant to the future zoning of the subject land and surrounding industrial land west of the railway line.

At its meeting of 29 September 2020, Council considered and endorsed the Campbelltown Local Housing Strategy (LHS). The LHS is currently being considered by the DPIE for endorsement. The Draft Campbelltown Strategic Review of Employment Lands Strategy has been prepared in tandem with the Campbelltown LHS, and was reported to the Council meeting of 8 September, 2020 where Council considered the draft Study and endorsed it for public exhibition which is currently occurring.

The evidence base and preliminary work complete under these studies supports the retention of the subject site for employment outcomes to ensure the sustainable development of the city centre to 2036 and beyond. The projected housing demand in the city centre over same period is planned to be accommodated within the existing zones of the city centre, primarily on the eastern side of the railway line. The planned revitalisation of the Queen Street precinct is dependent upon the viable uptake of new shop top housing within this precinct. This vision for the city centre is clearly articulated in the Reimagining Campbelltown City Centre Master Plan, identifying the potential for the subject land and surrounds to form a high tech city servicing and innovation precinct.

Given that the PPR would involve highly consequential changes to the supply and location of housing and employment land within the Campbelltown city centre, it is considered prudent to ensure any rezoning of the land aligns with the final recommendations of these two strategies.

5.7 Campbelltown Macarthur Place Strategy

The Greater Sydney Commission published the Campbelltown Macarthur Place Strategy (Place Strategy) in March 2020. The Place Strategy adopts the same boundary as the Reimagining Campbelltown City Centre Master Plan. The Place Strategy details actions requiring a high degree of collaboration between multiple stakeholders and is more than a land use planning document. It contains specific priorities and actions required to realise a sustainable, resilient and prosperous Campbelltown-Macarthur.

In regards to productivity the Place Strategy notes the significant jobs deficit with only 34 per cent of employed residents working in the Campbelltown LGA. While generally a higher level document, the Place Strategy makes particular mention of the Blaxland Road industrial precinct, which along with industrial lands at Minto and Ingleburn has the potential to build on existing sector strengths as well as transition to advanced manufacturing and precision engineering. The Place Strategy references Council's Economic Development Strategy which emphasises the opportunities for specialisation in technology based products to radically reshape the city centre's industrial precincts. The Place Strategy highlights the potential for local advanced manufacturing to create competitive advantages in goods that support the transition to technologies such as health related devices, driverless cars and renewable energy.

Therefore the Place Strategy promotes the use of the Blaxland Road industrial precinct for land uses that are not predominantly residential, as is proposed in the subject PPR.

6. Advice of the Panel

The PPR was reported to the Panel for advice on 23 September 2020, as required under Section 2.19 of the EP&A Act. The advice of the Panel as well as their considerations and reasons for their decision is presented below:

Advice of the Panel to Council

The Panel does not consider that the planning proposal request has demonstrated that it has strategic or site specific merit and therefore recommends that Council not proceed with a request for a Gateway determination for this proposal.

Panel Considerations and Reasons for Decision

The Panel noted the explanation by the proponent that the PPR is based on the Ministerial Direction in regards to the Campbelltown Precinct Plan November 2017 in the Glenfield to Macarthur Urban Renewal Corridor Strategy.

However the Panel also noted that there are a number of other strategic plans that post-date the Corridor Strategy including the Western City District Plan March 2018. These later strategic plans provide for and envisage alternate strategic outcomes for the site and the proposal is not consistent with these.

The planning proposal, Urban Design Study and associated precinct plan relates to a 2.84ha site within a broader 17.6ha precinct and does not integrate with or reflect the vision for the broader precinct and is not compatible with that vision.

In addition, the Western City District Plan requires Council to retain and manage industrial and urban services lands and protect them from residential uses.

The Panel were of the view that:

- a) The planning proposal lacks site specific merit as the proposal is surrounded by significant employment lands, creating the potential for undesirable land use conflict.
- b) There is insufficient supporting evidence of employment generation for the site and an analysis of potential adverse impacts on adjoining employment lands.
- c) There is sufficient capacity within the Campbelltown Local Government Area for additional dwellings to meet housing targets in land already zoned for high density residential or mixed use development.
- d) The proposal could compromise the revitalisation of the Campbelltown City Centre and residential development opportunities identified in the Re-imagining Campbelltown City Centre Masterplan 2020.
- e) The site is not well located to existing open space within a 200 metre radius, and services and facilities required for high density residential development.
- f) The proposal is isolated in nature and is not part of a wider endorsed strategy of renewal as envisaged by the proponent that is required for the efficient and orderly development of urban land in a regional centre.

Accordingly, the Panel has recommended Council not proceed with a request for a Gateway determination for this proposal given that it has not demonstrated strategic or site specific merit.

7. Public Participation

Should the PPR be supported by Council for a Gateway Determination and exhibition (which this report does not recommend), public consultation would take place in accordance with the conditions of any Gateway Determination made by the DPIE in accordance with Sections 56 & 57 of the EP&A Act.

8. Key Issues and Concerns

The key issues and concerns with the Planning Proposal Request, as discussed in this report, are listed below:

- The proposal would lead to the loss of industrial land that has an important economic and employment function.
- The proposal would eliminate the opportunity for a significant employment-generating economic activity to take place on the site, e.g. a large-scale health/education related land use or a business park.
- The proposal would prevent/delay the timely urban renewal of the Campbelltown CBD by absorbing much of the medium-term demand for residential and commercial floor space within Campbelltown.
- The maximum building height proposed is considered to be excessive, having regard to the desired distribution of building heights under the Reimagining Campbelltown City Centre Master Plan and overshadowing impacts.
- Introducing residential development into the area west of the railway line would lead to severe land use conflicts, in terms of noise, odour, dust, traffic and operating hours.
- A residential development on the subject site would have a poor level of residential amenity due to the surrounding land uses. Views from apartments would be predominantly of industrial buildings.
- Having residential apartments on the ground level of the development adjacent to Bow Bowling Creek, as the PPR proposes, would not support the level of activation sought in the vision for this creek in the Reimagining Campbelltown City Centre Master Plan.
- The extent of land needed from the subject site for the Badgally Road - Broughton Street Bridge is unknown at this stage, so the proposal is premature and could compromise the delivery of this bridge.
- Whilst the Urban Design Study that accompanies the PPR indicates that the site would accommodate public parklands, No RE1 Public Recreation zoning has been indicated on the proposed zoning map, so it is unclear how certainty could be achieved in terms of the delivery of these parks.

9. Additional studies

Notwithstanding the key issues and concerns outlined above, should Council decide to support the proposal then a comprehensive investigation of issues, including (but not limited to) the following studies, would need to be undertaken prior to public exhibition:

- Traffic and Parking Assessment
- Road Corridor Reservation Study in relation to the Badgally-Broughton bridge
- Bow Bowling Public Open Space Corridor Study
- Public Domain Strategy
- Open Space Needs Analysis
- Detailed Contamination Assessment
- Site Specific DCP including a master plan
- Urban design analysis to formulate appropriate development standards in relation to FSR, qualifying site area and block depths
- A funding strategy for the provision of infrastructure including urban domain enhancements, any road improvement that may be needed and drainage works to reduce flooding impacts
- Consideration of appropriate mechanisms to deliver affordable housing across the site and formulation of a strategy in this regard

The above studies would need to be finalised to the requirements of Council and may require revision to the PPR.

10. Conclusion

The Planning Proposal Request seeks the following amendments to Campbelltown Local Environmental Plan 2015 for No.2 Farrow Road, Campbelltown:

- a. Removal of the subject site from the “Deferred Matters” area on the Land Application Map.
- b. Amend the zoning of the site from 4(b) – Industrial B (which applies under CLEP 2002 because the site is within a deferred area) to B4 Mixed Use.
- c. Amend the Height of Buildings Map to apply a series of height limits across the site, ranging from 63 to 101 metres.
- d. Add a Clause 41 to “Schedule 1: Additional Permitted Uses” of the CLEP, to exempt residential flat buildings on the site adjacent to Bow Bowling Creek from having to comply with Clause 7.9 of the CLEP, which requires that buildings in the B4 zone have an active street frontage and contain only non-residential land uses on their ground floors.

The proposed rezoning of the land to allow for predominantly residential outcomes on the site with limited business activity does not capitalise on the strategic importance of the site to promote employment growth for the Campbelltown City Centre and is therefore considered to be inconsistent with the relevant objectives and strategies of the state and local planning framework. Details of these inconsistencies are discussed in the body of the report, however generally relate to the following broad issues:

- loss of strategically important employment land
- unwarranted expansion of housing capacity in a location where there is a high risk of land use conflict
- potential negative impacts on the revitalisation of Queen Street
- Urban design impacts from excessive building heights

Enabling high density and high rise residential development on the subject site at this time would detract from Council's short term goal of Revitalising Queen Street. It is proposed that Queen Street would be revitalised, in part, by encouraging in-centre living in residential apartments in the short to medium term. Any rezoning of land for similar land uses on the western side of the railway line should not be prioritised until such time as the revitalisation of Queen Street has been realised.

The Panel considered the PPR at its meeting of 23 September 2020, and has recommended that Council not proceed with a request for a Gateway determination given that it does not consider that the PPR has demonstrated that it has strategic or site specific merit.

Given the significance of the issues and concerns outlined above, and having regard to the advice of the Panel, it is considered that Council should not support the PPR for a Gateway Determination.

Attachments

1. Planning Proposal Request (due to size) (distributed under separate cover)
2. Urban Design Study (due to size) (distributed under separate cover)
3. Addendum to Urban Design Study (distributed under separate cover)
4. Amended Height of Buildings Map (distributed under separate cover)